

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
IN CLERKS OFFICE  
2023 SEP -6 AM 10:49

UNITED STATES OF AMERICA

v.

ANDREA ANDERSON,

Defendant

) Criminal No. 23cr10241

) Violation:

) Count One: Embezzlement from a Labor Union  
(29 U.S.C. § 501(c))

) Forfeiture Allegation:  
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C.  
§ 2461(c))

INFORMATION

COUNT ONE

Embezzlement from a Labor Union  
(29 U.S.C. § 501(c))

The Acting United States Attorney charges that:

From on or about July 1, 2018, through July 31, 2022, in Lakeville, in the District of  
Massachusetts, and elsewhere, the defendant,

ANDREA ANDERSON,

did embezzle, steal and unlawfully and willfully abstract and convert to her own use the moneys,  
funds, securities, property, and other assets, in the approximate amount of \$39,169, of the  
Brotherhood of Shoe and Allied Craftsman, a labor organization engaged in an industry affecting  
commerce, by which she was directly and indirectly employed.

All in violation of Title 29, United States Code, Section 501(c).

FORFEITURE ALLEGATION  
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

The Acting United States Attorney further alleges that:

1. Upon conviction of the offense in violation of Title 29, United States Code, Section 501(c), set forth in Count One of this Information,

ANDREA ANDERSON,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to, the following:

a. a forfeiture money judgment in the amount of \$30,316.00.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States of America, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of

any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

Respectfully submitted,

JOSHUA S. LEVY  
Acting United States Attorney

/s/ Laura J. Kaplan  
BY: Laura J. Kaplan  
Assistant U.S. Attorney

Date: September 6, 2023